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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION – LOS ANGELES

Frankel, et al.,

Case No. 2:24-CV-4702-MCS

Plaintiffs,

STIPULATION FOR CONSENT JUDGMENT AND PERMANENT INJUNCTION

Regents of the University of California, et al.,

Judge: Hon. Mark C. Scarsi
Courtroom: 7C

Defendants.

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1 WHEREAS, Plaintiffs Yitzchok Frankel; Joshua Ghayoum; Eden
2 Shemuelian; and Dr. Kamran Shamsa (“Plaintiffs”) and Defendants The Regents of
3 the University of California; Michael V. Drake; Julio Frenk; Darnell Hunt; Michael
4 Beck; Monroe Gorden, Jr.; and Steve Lurie (“Defendants”) (collectively, the
5 “Parties”) have settled this case, *see* ECF 205 (Joint Status Report);

6 WHEREAS, the Parties have agreed to the entry of the attached [Proposed]
7 Consent Judgment and Permanent Injunction, as evidenced by their signatures on
8 this stipulation;

9 THEREFORE, IT IS HEREBY AGREED AND STIPULATED, by and
10 between the Parties, that the [Proposed] Consent Judgment and Permanent
11 Injunction may be entered by the Court, and the Parties respectfully request that the
12 Court do so.

13 **IT IS SO STIPULATED.**

14 Dated: July 28, 2025

15 Respectfully submitted,

16 By: /s/ Matthew R. Cowan
17 MATTHEW R. COWAN
18 *Attorney for Defendants The Regents of
19 the University of California; Michael V.
20 Drake; Julio Frenk; Darnell Hunt;
21 Michael Beck; Monroe Gorden, Jr.;
22 and Steve Lurie*

23 /s/ Mark L. Rienzi
24 MARK L. RIENZI
25 *Attorney for Plaintiffs Yitzchok
26 Frankel; Joshua Ghayoum; Eden
27 Shemuelian; and Dr. Kamran Shamsa*

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4, I hereby attest that the other signature listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 28, 2025

Respectfully submitted,

By: /s/ Matthew R. Cowan
MATTHEW R. COWAN
The Regents of the University of California; Michael V. Drake; Julio Frenk; Darnell Hunt; Michael Beck; Monroe Gorden, Jr.; and Steve Lurie